

BRETT A. AXELROD, ESQ., NV Bar No. 5849
 JEANETTE E. MCPHERSON, ESQ., NV Bar No. 5423
 NICHOLAS A. KOFFROTH, ESQ., NV Bar No. 16264
 ZACHARY T. WILLIAMS, ESQ., NV Bar No. 16023

FOX ROTHSCHILD LLP

1980 Festival Plaza Drive, Suite 700
 Las Vegas, Nevada 89135

Telephone: (702) 262-6899

Facsimile: (702) 597-5503

Email: baxelrod@foxrothschild.com

jmcpherson@foxrothschild.com

nkoffroth@foxrothschild.com

zwilliams@foxrothschild.com

Electronically Filed July 12, 2023

Counsel for Debtor Cash Cloud Inc.

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re

CASH CLOUD, INC.,
 dba COIN CLOUD

Debtor.

Case No. BK-23-10423-MKN

Chapter 11

**DECLARATION OF JIM HALL IN SUPPORT
 OF RESPONSE TO MOTION FOR
 APPROVAL OF ADMINISTRATIVE CLAIM**

Hearing Date: July 20, 2023

Hearing Time: 10:30 a.m.

I, Jim Hall, declare as follows:

1. I am the Vice President of Finance & Accounting of Cash Cloud, Inc., dba Coin Cloud, the debtor and debtor-in-possession (the "Debtor").

2. In my capacity as the Vice President of Finance & Accounting of the Debtor, I am familiar with the financial records of the Debtor. I make this Declaration in support of the *Response To Motion For Approval Of Administrative Claim* (the "Response")¹ filed by the Debtor.

3. Except as otherwise indicated herein, this Declaration is based upon my personal knowledge. I am over the age of 18 and am mentally competent. If called upon to testify, I would testify competently to the facts set forth in this Declaration.

¹ Capitalized terms not defined herein shall have the meanings assigned to them in the Response.

1
2 4. The Debtor filed a voluntary petition for relief under Chapter 11 of the Bankruptcy
3 Code on February 7, 2023 (the “Petition Date”).

4 5. The deadline for filing a proof of claim in this case is June 14, 2023. The deadline for
5 filing a proof of claim for a governmental unit is August 7, 2023.

6 6. Trangistics filed a proof of claim on March 26, 2023, in the amount of \$263,888.86
7 (“POC 26”).

8 7. On June 13, 2023, Trangistics filed a Proof of Non-Professional Administrative
9 Expense, claim number 105, which asserts an administrative expense claim for the period of February
10 7, 2023 through May 6, 2023 in the amount \$154,400, with \$38,600.00 per month (“POC 105”).

11 8. Trangistics has also filed the Motion For Approval Of Administrative Claim on June
12 12, 2023 [ECF 652] (“Motion”). In the Motion, Trangistics requests allowance of an administrative
13 expense claim in the amount of \$154,400 from February 7, 2023 through May 6, 2023 and an
14 additional amount of \$38,600.00 for each month thereafter. Attached to the Motion is POC 105.

15 9. The Debtor acknowledges that Trangistics is storing kiosks. I have reviewed the
16 Debtor’s records and I am not aware of an actual written contract with Trangistics. I note that the
17 employee responsible for dealings with Trangistics is no longer employed by the Debtor and
18 attempts to contact him were not successful.

19 10. Trangistics, at some point, invoiced the Debtor in the amount of \$38,600 for
20 storage.²

21 11. Upon information and belief, I understand that Trangistics pays the owner of the
22 warehouse significantly less than \$38,600. That is, upon information and belief, the owner of the
23 warehouse that stores the kiosks charges Trangistics the amount of \$30,500.

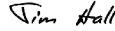
24 12. For the postpetition period, payment was made to Trangistics in the amount of
25 \$38,600.00, which payment was processed by the bank on or around April 7, 2023 for the March
26 invoice. See Exhibit 1 attached hereto.

27
28 ² The Debtor does not have record of receiving invoices from Trangistics for January, February, May, and June 2023.

1 I declare, under penalty of perjury of the laws of the United States of America, that the
2 foregoing statements are true and correct to the best of information, knowledge and belief.

3 Executed this 12th day of July, 2023 in Las Vegas, Nevada.

DocuSigned by:



D963491BCF1F446...

JIM HALL

FOX ROTHSCHILD LLP
1980 Festival Plaza Drive, Suite 700
Las Vegas, Nevada 89135
(702) 262-6899
(702) 597-5503 (fax)

EXHIBIT 1

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

FOX ROTHSCHILD LLP
1980 Festival Plaza Drive, Suite 700
Las Vegas, Nevada 89135
(702) 262-6899
(702) 597-5503 (fax)



Post Office Box 306
Crawford, Georgia 30630
706-743-8184
www.thecommercialbank.net

Cash Cloud INC
DBA Coin Cloud
Accounts Payable
10845 GRIFFITH PEAK DR STE 200
LAS VEGAS NV 89135

VIRTUAL CURRENCY CHECKING
 [REDACTED] 833

03/31/23 THRU 04/30/23

PAGE 1

VIRTUAL CURRENCY CHECKING 833

DESCRIPTION	DEBITS	CREDITS	DATE	BALANCE
-------------	--------	---------	------	---------

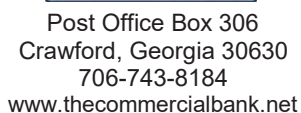
CCD Cash Cloud INC Payment 1

440,039.32

04/07/23

117,548.12

* * * C O N T I N U E D * * *



VIRTUAL CURRENCY CHECKING
 [REDACTED] 833

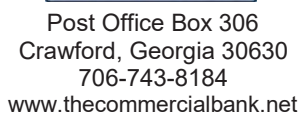
03/31/23 THRU 04/30/23

PAGE 2

VIRTUAL CURRENCY CHECKING 833

DESCRIPTION	DEBITS	CREDITS	DATE	BALANCE
-------------	--------	---------	------	---------

* * * C O N T I N U E D * * *



VIRTUAL CURRENCY CHECKING
 [REDACTED] 833

03/31/23 THRU 04/30/23

PAGE 3

VIRTUAL CURRENCY CHECKING 833

DESCRIPTION	DEBITS	CREDITS	DATE	BALANCE
-------------	--------	---------	------	---------

21

* * * C O N T I N U E D * * *



Post Office Box 306
Crawford, Georgia 30630
706-743-8184
www.thecommercialbank.net

Cash Cloud INC
DBA Coin Cloud
Accounts Payable
10845 GRIFFITH PEAK DR STE 200
LAS VEGAS NV 89135

VIRTUAL CURRENCY CHECKING

03/31/23 THRU 04/30/23

PAGE 4

VIRTUAL CURRENCY CHECKING 833

DESCRIPTION	DEBITS	CREDITS	DATE	BALANCE
-------------	--------	---------	------	---------

* * * C O N T I N U E D * * *



Post Office Box 306
Crawford, Georgia 30630
706-743-8184
www.thecommercialbank.net

Cash Cloud INC
DBA Coin Cloud
Accounts Payable
10845 GRIFFITH PEAK DR STE 200
LAS VEGAS NV 89135

VIRTUAL CURRENCY CHECKING
 833

03/31/23 THRU 04/30/23

PAGE 5

VIR TUAL CURRENCY CHECKING 833

DESCRIPTION	DEBITS	CREDITS	DATE	BALANCE
-------------	--------	---------	------	---------

A 10x10 grid of 100 squares, each containing a number from 1 to 100. The numbers are arranged in a spiral pattern starting from the center (50 in the middle) and moving outwards in a clockwise direction.

* * * C O N T I N U E D * * *



VIRTUAL CURRENCY CHECKING
 [REDACTED] 833

03/31/23 THRU 04/30/23

PAGE 6

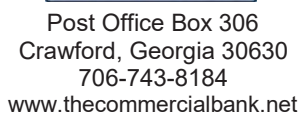
VIRTUAL CURRENCY CHECKING 833

DESCRIPTION	DEBITS	CREDITS	DATE	BALANCE
-------------	--------	---------	------	---------

A stylized graphic of the number 1111. It consists of four vertical bars of varying heights and widths, arranged from left to right. Each bar is composed of horizontal segments of different lengths, creating a stepped, architectural appearance. The bars are dark gray, and the segments are separated by thin white lines. The overall effect is a modern, geometric representation of the number 1111.

* * * C O N T I N U E D * * *

* * * C O N T I N U E D * * *



VIRTUAL CURRENCY CHECKING
 [REDACTED] 833

03/31/23 THRU 04/30/23

PAGE 8

VIRTUAL CURRENCY CHECKING 833

DATE	CHECK #	AMOUNT	DATE	CHECK #	AMOUNT	DATE	CHECK #	AMOUNT
------	---------	--------	------	---------	--------	------	---------	--------

[illegible]

* * * C O N T I N U E D * * *



Post Office Box 306
Crawford, Georgia 30630
706-743-8184
www.thecommercialbank.net

Cash Cloud INC
DBA Coin Cloud
Accounts Payable
10845 GRIFFITH PEAK DR STE 200
LAS VEGAS NV 89135

VIRTUAL CURRENCY CHECKING
833

03/31/23 THRU 04/30/23

PAGE 9

=====

VIRTUAL CURRENCY CHECKING						833		
---------------------------	--	--	--	--	--	-----	--	--

=====

DATE	CHECK #	AMOUNT	DATE	CHECK #	AMOUNT	DATE	CHECK #	AMOUNT
------	---------	--------	------	---------	--------	------	---------	--------

██████████	██████████	██████████	██████████	██████████	██████████	██████████	██████████	██████████
██████████	██████████	██████████	██████████	██████████	██████████	██████████	██████████	██████████
██████████	██████████	██████████	██████████	██████████	██████████	██████████	██████████	██████████
██████████	██████████	██████████	██████████	██████████	██████████	██████████	██████████	██████████
██████████	██████████	██████████	██████████	██████████	██████████	██████████	██████████	██████████

██

- - - - - A V E R A G E B A L A N C E - - - - -

██

-----End-of-Statement-for-above-Account-----

622123000220153665375363 00038600009672 Tranqisticks Inc 0061110650000005

Commercial Bank Cash Cloud Inc.
230406230406

Bill

115409040

Trangistics Inc

Paid in Full

Back

Credit

Authorize Return

Resubmit

Print

Actions

▼

Sticky Notes

▼

New:

Private Information

REFERENCE NO.: 115409040

VE: Trangistics Inc

ACCOUNT: 201 Warehouse Bankruptcy filing AP - Trade

AMOUNT: 38,600.00

DATE: 4/14/2023

POSTING PERIOD: Apr 2023

DUE DATE: 4/14/2023

DISC. DATE:

DISC. AMT:

NUMBER OF APPROVALS:

☐ PAYMENT HOLD

☒ BYPASS CPO

APPROVAL STATUS: Approved

MEMO: Warehouse Expenses for March 14K Square Feet Square Feet 0x0x0

DEPARTMENT APPROVAL: DEPARTMENT APPROVAL

NEXT APPROVER: Joshua Burke

Classification

DUES TO: Cashland Inc

CURFELLY: U5

EX: GE RATE

MACHINE:

☐ EMAIL SENT

SUPPORTING DOCUMENT:

LOCATION:

LOCATION SEG (A):

1.4.

Types and Items

Billing

Relationships

Communication

Related Records

System Information

Additional Information

GL Impact

115409040

E3755FAA

Bill Payment

000005645

38,600.00

38,600.00

Drop files here. Click for more options.

←

→

List

Search

Custom



INVOICE

Invoice #	115409040
Invoice Date	4/4/2023
Pro Number	
Service Level	Normal
Paid Date:	

Payable To:
Trangistics, Inc.
PO Box 1750
SISTERS, OR 97759
Tel. (541) 923-6309

Bill To:
Cash Coin Inc.
9580 W. Sahara Ave. - STE 200
Las Vegas, NV 89117, US

Shipment Details:
Shipment Date: 3/13/2023
Customer: Cash Coin Inc.
BOL Number: 115409040
PO Reference:
Shipper Number:
Delivered: None
Delivery Signed By:

Shipment Origin:
Cash Coin Inc.
9580 W. Sahara Ave. - STE 200
Las Vegas, NV 89117
Contact person:
Phone: (702) 727-9356

Shipment Destination:
Power House Las Vegas NV
561 Parkson Road
LAS VEGAS, NV 89101
Contact person:
Phone:

Origin Accessorials
None

Destination Accessorials
None

Handling Units	Piece Count	Commodity Description	Class	Weight
1 Unit	1	Warehouse Expenses for March 14K square feet Square Feet 0x0x0 in	No Class	1,000 lbs
1	1	TOTALS		1,000 lbs

Shipment Data Audit

This section compares user entered data at the time of booking to verified data reported by the carrier at time of invoicing. No Change means that the audited values have not been changed.

Pricing Changes:

✓ No Changes

Accessorial Changes:

✓ No Changes

Weight Changes:

✓ No Changes

Shipping Location Changes:

✓ No Changes

Freight Class Changes:

✓ No Changes

In the last 6 months, your user entered shipment detail has been accurate on 100% of invoices.

Pricing			
Detail	Quantity	Rate	Total
Fuel	1.00	\$0.00	\$0.00
Linehaul	1.00	\$38,600.00	\$38,600.00
Total Due			\$38,600.00
Amount Paid			\$(0.00)
Balance Due			\$38,600.00

Shipment Documents

BOL115409040 - BOL

Thank you for using Trangistics, Inc..